

**REMARKS**

In Section 3 of the Final Office Action, the Examiner states that the proposed drawing corrections previously filed on December 19, 2002 have been approved. Enclosed with this response are substitute sheets of drawings for Figs. 4, 5, 7, 8, 9, and 11 incorporating the approved drawing corrections.

In Section 5 of the Final Office Action, the Examiner rejects claims 1, 2, 6-7, 8-11, 14, 15, 18, and 19 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,101,482 to DiAngelo et al. ("DiAngelo") over "An Open Medical Imaging Workstation Architecture for Platform-Independent 3-D Medical Image Processing and Visualization" by Domagoj Cosic, IEEE Transactions on Information technology in Biomedicine, Vol. 1, No. 4, December 1997 ("Cosic"). In Section 6 of the Final Office Action, the Examiner rejects claims 3-5, 12, 13, 16, 17, 20 and 21 under 35 U.S.C. § 103(a) as being unpatentable over DiAngelo in view of Cosic further in view of U.S. Patent No. 5,930,764 to Melchione et al. These rejections are respectfully traversed.

DiAngelo discloses an on-line (Internet) purchasing system that includes a browser, where a plug-in for the browser provides a shopping cart function that enables a user to conduct electronic transactions with shopping cart-enabled Web servers. (Col. 5, lines 15-27; Fig. 3; and col. 8, lines 25-47). DiAngelo also describes a Web server that includes an application programming interface that allows the core functionality of the Web server to be extended through plug-ins. (Col. 5, lines 3-14). Cosic discloses the use of plug-in tools in the image processing unit of a medical imaging workstation. (Pages 280-281 and Figs. 2 and 3).

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With regard to claim 1, the Examiner acknowledges that DiAngelo and Cosic do not teach “associating the client-side plug-in component with the server-side plug-in component” and “operating the server-side plug-in component in response to the client-side plug-in component”, as required by the claim. Although the Examiner asserts that it would have been obvious to modify DiAngelo to obtain these missing limitations of claim 1, the Applicant respectfully submits that such an assertion is based on impermissible hindsight as such a modification is suggested only by the present application and not the prior art.

Specifically, the Examiner asserts that it would have been obvious to modify DiAngelo to associate the client-side plug-in component with the server-side plug-in component to obtain the services of server-side plug-in components. However, even if DiAngelo suggests a client/server system where the client includes client-side plug-in components and the server includes server-side plug-in components, this alone does not suggest that the client-side plug-in be associated with the server-side plug-in as the Examiner suggests, because, as described further below, the services of the server-side plug-in may be obtained through the original client functionality, i.e., excluding the client-side plug-in, and vice versa, i.e., the services of the client-side plug-in may be obtained by operating the client-side plug-in in connection with the original server functionality. Thus, “[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.” See *MPEP* § 2143.01 (citing *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990)).

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As stated above, in a client/server system where the client includes client-side plug-in components and the server includes server-side plug-in components, the client-side plug-in may operate in connection with server functionality other than provided by a server-side plug-in component, such as server functionality provided by the original server application, i.e., unmodified by any server-side plug-in. Vice versa, the server-side plug-in component may operate in response to client functionality other than provided by the client-side plug-in.

For example, in a marketing campaign system, an original client/server application, i.e., prior to functionality being added via plug-ins, may involve a client providing input via text entry and a server executing a function, such as a database query, based on the input provided by the client. The application's functionality is extended on the client side by a client-side plug-in which allows entry of information via GUI (e.g., a map enabling a user to identify different geographical regions) and is extended on the server side by a new function which splits the results of the database query results based on user identified geographic regions.

The fact that the client/server application's functionality has been extended by a client-side plug-in and a server-side plug-in does not necessarily mean that the client-side plug-in must be associated with the server-side plug-in or that the server-side plug-in must operate in response to the client-side plug-in. Following the example above, the client-side plug-in allowing a user to graphically identify different geographic regions may be operated only with the original server functionality of a database query and need not be operated in connection with the server-side plug-in. Similarly, the server-side plug-in of splitting the database query results based on user

identified geographic regions may be operated in conjunction with the original client functionality of providing input via text entry.

Associating the client-side plug-in component with the server-side plug-in component and operating the server-side plug-in component in response to the client-side plug-in component, as taught by the invention of claim 1, provides a new level of functionality not necessarily available in a client/server system in which both client-side plug-ins and server-side plug-ins exist. Thus, referring again to the above example, associating the client-side plug-in with the server-side plug-in would provide a new functionality of allowing the criteria on which the new splitting operation is based to be provided via GUI.

Therefore, the Applicant respectfully submits that even if DiAngelo and Cosic suggest the use of client-side plug-in components and server-side plug-in components in the same client/server system, neither reference, alone or in combination, suggests “associating the client-side plug-in component with the server-side plug-in component” and “operating the server-side plug-in component in response to the client-side plug-in component”, as required by claim 1. For at least this reason, the Applicant respectfully submits that the cited prior art does not obviate claim 1. As such, the Applicant submits that claim 1 is patentably distinct from DiAngelo and Cosic and is allowable over the prior art.

Claim 8 recites “means for associating a client-side plug-in component with a server-side plug-in component” and “means for operating the server-side plug-in component in response to the client-side plug-in component”. Claim 19 recites “a server-side plug-in component

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stored on the readable media, the server-side plug-in component being adapted to operate in response to data provided by a client-side plug-in component". The Applicant respectfully submits that claims 8 and 19 are patentably distinct from DiAngelo and Cosic for similar reasons as stated above in connection with claim 1 and are therefore also allowable over the prior art.

Claims 9, 14, and 18 recite a client-side plug-in component communicating with a server-side plug-in component. As suggested above in connection with claim 1, the mere fact that a client/server system that includes both client-side plug-ins and server-side plug-ins does not necessarily mean that the client-side plug-ins are aware of the existence of the server-side plug-ins since the client-side plug-ins may operate in connection with only the original server functionality and, vice versa, the server-side plug-ins may operate in connection with only the original client functionality. Thus, there is no suggestion, either from DiAngelo and Cosic, alone or in combination, of a client-side plug-in component communicating with a server-side plug-in component. This functionality is suggested only by the inventions of claims 9, 14, and 18. For at least this reason, the Applicant respectfully submits that the cited prior art does not obviate claims 9, 14, and 18. As such, the Applicant submits that claims 9, 14, and 18 are patentably distinct from DiAngelo and Cosic and are allowable over the prior art.

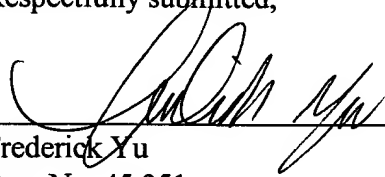
With respect to the pending dependent claims 2-7, 10-13, 15-17, and 20-21, as these claims depend from independent claims 1, 8, 9, 14, 18, and 19, which Applicant submits are allowable over the prior art, Applicant submits that these dependent claims are also allowable over the prior art for at least the same reasons. Therefore, Applicant respectfully submits that all

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pending claims 1-21 are allowable and allowance of all claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the Applicant's undersigned representative to discuss any issues relating to this application.

Respectfully submitted,

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